

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

WILBER ENSLEY, ET AL.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:17CV024
)	
CITY OF RICHMOND,)	
ET AL.,)	
)	
Defendants.)	

**CITY OF RICHMOND’S
MOTION TO DISMISS**

The Defendant City of Richmond (“City”), pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, moves for the entry of an Order dismissing this matter with prejudice for Plaintiffs’ failure to state a claim upon which relief may be granted. In support of this Motion to Dismiss, the City asserts the reasons stated in the accompanying Memorandum of Law.

Respectfully Submitted,

_____/s/_____
Stephen M. Hall, Esquire (VSB # 44132)
Deputy City Attorney
Richard E. Hill, Jr., Esquire (VSB #44164)
Assistant City Attorney
900 East Broad Street, Room 400
Richmond, Virginia 23219
Telephone: (804) 646-7953
Facsimile: (804) 646-79396
Email: Stephen.Hall@richmondgov.com
Email: Richard.E.Hill@richmondgov.com
Counsel for Defendant City of Richmond

CERTIFICATE

I hereby certify that on this 3rd day of March 2017, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

_____/s/_____

Stephen M. Hall (VSB # 44132)

Deputy City Attorney

900 East Broad Street, Room 400

Richmond, VA 23219

Telephone: (804) 646-7953

Facsimile: (804) 646-7939

stephen.hall@richmondgov.com

Counsel for Defendant City of Richmond